

LAW OFFICES OF
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May 16, 2017

VIA EMAIL ONLY

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Re: *Jane Doe #1, et al v Mayfield City School Dist. Bd of Ed*

Dear Counsel;

I am available for the deposition of Sydney Shanaberger on May 26, 2017. Ms. Shanaberger has obligations on both May 18, 2017 and May 26, 2017, but is seeking to reschedule her commitments for May 26, 2017. I have not heard from any of the defense counsel as to my other outstanding requests for records, documents and depositions, which have been the subject of numerous letters. Once again, I am summarizing my current discovery requests and would like a response from counsel no later than May 19, 2017. In absence of response with dates and times for the depositions requested, I will commence to issue subpoenas for the attendance of your clients' employees.

OUTSTANDING DISCOVERY REQUESTS TO MAYFIELD CITY SCHOOL DISTRICT:

Documents/Inspections:

1. Enclosed is Plaintiffs' Request for Inspection of Relevant Areas of Mayfield High School;
2. Enclosed is the Plaintiffs' Third Request for Production of Documents

There has been no resolution of my previously submitted Item #9 of the Second Amended Duces Tecum to the Second Amended Notice to Take Deposition of Defendant Mayfield City School District Board of Education Pursuant to Rule 30(b)(6). I previously thoroughly discussed this subject with my IT expert, who informs me that the response of your client is a "red herring". A searchable disc, and the other options outlined in my letter dated February 27, 2017 (copy enclosed), ensures that relevant documents to this case are not withheld from me yet at the time the Protective Order in place protects the School Board. If you are unwilling to comply with my request, I will proceed to bring this issue before the court by way of a Motion to Compel; kindly advise if that will be necessary.



Depositions:

1. Nancy Barron
2. Susan Beede
3. Jim Dasher
4. Janet Barr
5. Frank Stupczy
6. Diana Beebe, former President Mayfield Education Association (newly requested)

OUTSTANDING DISCOVERY REQUESTS TO CLEVELAND CLINIC FOUNDATION:

Documents:

1. You have not responded to the Plaintiffs' Second Request for Production of Documents served upon you on or about December 19, 2016
2. Missing original and revisions years to Plaintiffs' Deposition Exhibit #23 entitled **"Human Resources Enterprise-wide Policies and Procedures, Subject: Non-discrimination, Harassment or Retaliation"** (see letter dated May 9, 2017; enclosed again)
3. Missing original and revisions years to Plaintiffs' Deposition Exhibit #37 entitled **"Cleveland Clinic Health System – Eastern Region People Management Policies, Workplace Harassment 2.1"** (see letter dated May 9, 2017; enclosed again)

Enclosed is the Plaintiffs' Third Request for Production of Documents formalizing document requests that have been made to you numerous times, both in depositions and by letter, with the exception of Request #3, which is a new request.

Depositions:

1. Nancy Tichy – previously identified as you 30(b)(6) witness (by letter dated May 9, 2017)
2. Gerry Miller

Very truly yours,

/s/ Murray D. Bilfield

Murray D. Bilfield
BILFIELD & ASSOCIATES
MDB/srs

Enclosure